IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE: '318 PATENT INFRINGEMENT LITIGATION	)	Civil Action No. 05-356-KAJ (consolidated)

NOTICE OF DEPOSITION UNDER FED. R. CIV. P. 30(b)(6)
TO BARR PHARMACEUTICALS, INC. AND BARR LABORATORIES

PLEASE TAKE NOTICE that on June 13, 2006 commencing at 9:00 a.m., at the offices of Covington & Burling, 1201 Pennsylvania Avenue, N.W., Washington, D.C. 20004, Plaintiffs Janssen Pharmaceutica N.V., Janssen, L.P. and Synaptech, Inc. (collectively, "Plaintiffs" or "Janssen") will take the deposition upon oral examination of Defendant Barr Pharmaceuticals, Inc. and Barr Laboratories (collectively, "Barr") pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure. This deposition upon oral examination will be conducted before an officer authorized to administer oaths and will be recorded by stenographic and videographic means.

Plaintiffs serve this Notice without waiver of its objections to the deficiencies in Barr's document production and other discovery responses concerning the subject matter of the instant Notice, and reserve the right to continue this deposition as necessary in light of any subsequent document production by Barr.

Plaintiffs will take this deposition upon oral examination through one or more officers, directors, managing agents or other persons designated by Barr pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure as the person(s) knowledgeable to testify on Barr's behalf concerning the topics identified in Schedule A. Barr is requested to provide

counsel for Plaintiffs with the identity of the individual(s) who will testify regarding each topic at least one week in advance of the deposition. The deposition will continue from day to day until completed with such adjournments as to time and place as may be necessary. You are invited to attend and examine the witness(es).

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

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Dated: May 31, 2006

170046.1

SCHEDULE A

Definitions

1. As used herein, "Barr" shall mean Defendants Barr Pharmaceuticals, Inc. and Barr Laboratories and all of Barr's corporate parents, corporate predecessors and past or present subsidiaries, affiliates, divisions, departments, officers, directors, principals, agents and employees.

2. As used herein, "Barr's ANDA" shall mean Barr's Abbreviated New Drug Application Number 77-605.

3. As used herein, "the Generic Product" shall mean the proposed generic galantamine product that is the subject of Barr's ANDA.

4. As used herein, "the '318 patent" shall mean United States Patent No. 4,663,318.

5. As used herein, "document" shall have the full meaning ascribed to it by the Federal Rules of Civil Procedure and shall include any means for retaining information.

6. As used herein, "FDA" shall mean the United States Food and Drug Administration.

7. "Person" and "persons" mean any natural person and any business, legal, corporate, or governmental entity, association, or organization.

8. "Alzheimer's Disease" means any diagnosis, illness, or ailment described as being of the Alzheimer's type, including without limitation Senile Dementia of the Alzheimer's Type, and/or Alzheimer's Dementia.

9. "Galantamine" includes without limitation galantamine, galanthamine, and any salt of galatamine, such as galantamine hydrobromide.

Topics of Examination

1. Any and all documents that were distributed in anticipation of and/or in preparation for the June 2004 Galantamine Hydrobromide Tablets Kickoff Meeting.

2. The June 2004 Galantamine Hydrobromide Tablets Kickoff Meeting.

3. Any and all documents related to or that refer to "Galantamind."

4. Any and all communications between Barr and Dr. May Sano, and any and all documents relating to or reflecting such communications.

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of May, 2006, the attached **NOTICE OF DEPOSITION UNDER FED. R. CIV. P. 30(b)(6) TO BARR PHARMACEUTICALS, INC. AND BARR LABORATORIES** was served upon the below-named counsel of record at the address and in the manner indicated:

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